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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 13, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket 92-105, /NSD File No. L-98-139

Dear Madame Secretary:

Submitted herewith for filing in the referenced matter are an original and four paper copies of the Comments of NENA, APCO and NASNA, together with a cover sheet and a receipt copy for stamping.

Also enclosed is a 3.5 inch diskette in an IBM-compatible format using Wordperfect for Windows 5.1 software in a read-only mode. The diskette is in a separate envelope that also contains a copy of this letter.

Please direct any comments or questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "J. R. Hobson", with a large, stylized initial "J" that loops around the first part of the name.

James R. Hobson
Counsel for NENA

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Abbreviated Dialing Arrangements:)	CC Docket 92-105
Report to the North American)	NSD File No. L-98-139
Numbering Council (NANC))	

COMMENTS OF NENA, APCO AND NASNA

The National Emergency Number Association (“NENA”), the Association of Public-Safety Communications Officials-International, Inc. (“APCO”) and the National Association of State Nine One One Administrators (“NASNA”) hereby respond to the invitation of the Common Carrier Bureau¹ to comment on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council. (“NANC Report”)

NENA is a not-for-profit corporation of more than 6,000 members in the U.S. and abroad whose singular purpose is to advance the speed, accuracy and reliability of emergency calling and response. APCO is a not-for-profit professional organization dedicated to the enhancement of public safety communications, representing the people who manage, operate, maintain, and

¹ Public Notice, DA 98-2541, released December 14, 1998.

supply the communications systems used to safeguard the lives and property of citizens worldwide. NASNA's members administer emergency calling networks at the state level. We have participated in this docket in the past, chiefly to protect the uniqueness and memorability of the abbreviated dialing pattern 9-1-1.

As an initial matter, we agree with the NANC Report (3, 17) that "there appears to be little, if any, demonstrated need for additional nationally administered abbreviated dialing arrangements at this time."² Thus the Report recognizes that "an abbreviated dialing service may be local or regional in scope, requiring the use and recognition of the abbreviated dialing format only within the region." (9)

Likewise, we agree with the NANC Report conclusion that the residual unreserved "N11 codes are not appropriate resources for abbreviated dialing." (10) We are concerned, however, that 9-1-1 look-alikes not be allowed to confuse emergency callers by simply adding a fourth or fifth digit or symbol to the three-number sequence. For example, there is nothing in the Report's

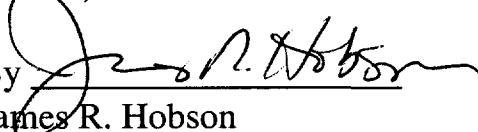
² While this recommendation may not have been made with the United Way's pending 211 petition in mind (NSD-L-98-80), we think it is pertinent to the United Way request and are separately submitting a copy of these comments as an ex parte communication to NSD-L-98-80.

discussion of “trailing” and “leading” # symbols (12-13) that would preclude the use of such arrangements as 911# or #9911.³

For the obvious reason of emergency caller confusion, we strongly urge the Commission to forbid or discourage such uses of the digits 9 and 1 in non-N11 abbreviated dialing arrangements. There are plenty of number sequences that could make use of the recommended leading or trailing # delimiters (17) without risking confusion with the N11 format of 9-1-1 reserved nationally for emergency calling in the United States.

Respectfully submitted,

NENA, APCO and NASNA

By 
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January 13, 1999

THEIR ATTORNEYS

³ Acknowledging the use of # leaders for some wireless intranetwork applications, the NANC Report notes that most of these applications contain no more than four digits. Thus, a # leader on a five-digit sequence probably would not be misread as a wireless intranet application. (13)

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

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- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the RIPS system.

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1 Diskette